

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MARK D. SCHAEFFER , aka	:	Chapter 13
Mark Douglas Schaeffer, aka Mark Schaeffer &	:	Case No. 18-10620-ref
DANIELLE CHRISTA SCHAEFFER , aka	:	
Danielle C. Schaeffer, aka Danielle Schaeffer,	:	
Debtor(s)	:	

SANTANDER BANK, N.A.,	:	
Movant	:	Motion for
v.	:	Relief from Stay
MARK D. SCHAEFFER ,	:	
DANIELLE CHRISTA SCHAEFFER and	:	
PATRICIA A. YEAKEL ,	:	
Respondents	:	

**ANSWER TO MOTION OF
SANTANDER BANK FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **MARK D. SCHAEFFER** and **DANIELLE CHRISTA SCHAEFFER**, by and through their attorneys, **NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C.**, and in Answer to the Motion of **SANTANDER BANK** for Relief from Stay avers:

1. Denied to the extent the averments of paragraph 1 are other than a statement or conclusion of law or request for relief that does not require a response.
2. Admitted.
3. Denied to the extent the documents referenced do not speak for themselves.
4. Admitted.
5. Denied to the extent the documents referenced do not speak for themselves.
6. Denied. Debtors lack sufficient information and belief to Admit or Deny the averments of paragraph 6 and such are therefore Denied. Debtors paid \$370.41 on August 10, 2018.

7. Denied. Debtors' most recent and readily verifiable payments were made June 27, July 27, and August 10, 2018. Debtors' First Amended Chapter 13 Plan does indicate, in Section 4(a), that Movant is to receive direct payments, which Counsel for Debtors indicated it would on April 4, 2018.

8. Admitted.

9. Denied. Debtors lack sufficient information and belief to Admit or Deny the averments of paragraph 9 and such are therefore Denied.

10. Denied to the extent the averments of paragraph 10 are other than a statement or conclusion of law or request for relief that does not require a response. Movant is adequately protected by direct payments and a small but growing equity buffer. The value of the subject property is not decreasing, and is reasonably believed to be increasing.

WHEREFORE, Debtor(s) **MARK D. SCHAEFFER** and **DANIELLE CHRISTA SCHAEFFER** respectfully pray this Honorable Court for an Order than the Motion of **SANTANDER BANK** for Relief from Stay be Denied, or, in the alternative, for an Adequate Protection Order conditioning the automatic stay on ongoing payments, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

By: /s/ J. Zac Christman

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